

AMENDMENTS TO THE DRAWINGS:

The attached replacement sheet(s) of drawings include(s) changes to Fig. 4.

In Fig. 4, original "2st" in box 43D has been changed to --2nd--.

Attachment: **Replacement Sheet(s)**

REMARKS

Applicants appreciate the Examiner's thorough review of the present application, and respectfully request reconsideration in light of the preceding amendments and the following remarks.

Claims 1-20 are pending in the application. Claims 1-11 remain unchanged notwithstanding the art rejections manifested in the Office Action. New claims 12-20 have been added to provide Applicants with the scope of protection to which they are believed entitled. The new claims find solid support in the original specification, e.g., page 17, lines 15-21 and page 24, lines 13-14, as well as the original drawings, e.g., Figs. 5 and 8c. Fig. 4 has been revised to correct a typographical error. No new matter has been introduced through the foregoing amendments.

The 35 U.S.C. 103(a) rejection of all original claims as being obvious over *Stenzel* (U.S. Patent No. 5,737,032) in view of *Kehtarnavaz* (U.S. Patent Application Publication No. 2003/0052978) and further in view of other teaching references is traversed, because the references singly or in combination fail to disclose, teach or suggest all limitations of the rejected claims, especially independent claim 1.

The Examiner's statement that *Stenzel* teaches a timing controller 50, an RGB multiplier 36 and a second YCbCr averaging unit 44 is noted. Applicants respectfully disagree with, at least, the Examiner's allegation that *Stenzel* teaches a second YCbCr averaging unit at 44. The Examiner's reliance on column 5 line 65 through column 6 line 11 of *Stenzel* for the claimed feature is noted. The cited passage is relevant, if at all, only at column 6 lines 5-6, i.e., "by averaging two adjacent samples Cb or Cr." Apparently, *Stenzel* only teaches, if at all, a CbCr averaging unit, rather than a YCbCr averaging unit as presently claimed. It should be noted that Y element 46 of *Stenzel* is not disclosed or suggested to average the Y data outputted from element 44.

Furthermore, it should be noted that the claimed second YCbCr averaging unit is arranged

to provide second YCbCr averages which are compared by a RGB gain controller with predetermined target YCbCr averages to control the RGB gains used by the RGB multiplier. In *Stenzel*, the outputs of element 44 are neither provided to a RGB gain controller nor used for controlling the RGB gains (KA, KB, KC) used by the RGB multiplier 36. The element 44 of *Stenzel* is therefore unreadable on the claimed second YCbCr averaging unit.

Accordingly, Applicants respectfully submit that *Stenzel* fails to teach or suggest the claimed second YCbCr averaging unit.

The Examiner's statement that *Kehtarnavaz* teaches a first YCbCr averaging unit and a RGB gain controller is also noted. Applicants have carefully reviewed the cited portions of the applied reference, i.e., paragraphs 0035, 0038 and 0048 as well as Fig. 2, and still failed to locate any teachings of the alleged claim features.

For example, Fig. 2 and paragraphs 0035 and 0038 of *Kehtarnavaz* fail to teach or suggest the claimed first YCbCr averaging unit for... obtaining first YCbCr averages Y1avg, Cb1avg and Cr1avg of this YCbCr image data. The Examiner is kindly asked to explain how the cited portions of *Kehtarnavaz* teach or suggest obtaining averages of the CbCr image data.

Furthermore, Fig. 2 and paragraph 0043 of *Kehtarnavaz* fail to teach or suggest the claimed RGB gain controller for...obtaining and... providing the obtained RGB gains to the RGB multiplier. There is absolutely no disclosure in paragraph 0043 of *Kehtarnavaz* of how RGB gains may be obtained or provided to a RGB multiplier. It should be noted that paragraph 0043 of *Kehtarnavaz* deals with data processing in the CbCr space (line 8), and therefore, provides no disclosure or suggestion of RGB gains for a different color space.

Finally, the reference fails to teach or suggest the claimed relationship that the RGB gain controller uses the first YCbCr averages outputted by the first YCbCr averaging unit to obtains RGB gains. See, for example, the last paragraph of claim 1. It is unclear from the cited portions of

Kehtarnavaz as to whether any “first YCbCr averaging unit” allegedly taught or suggested in paragraphs 0035 and 0038 might output data to a “RGB gain controller” allegedly found in paragraph 0044.

Accordingly, Applicants respectfully submit that *Kehtarnavaz* fails to teach or suggest not only each of the claimed first YCbCr averaging unit and RGB gain controller, but also the claimed relationship between the claim elements.

Thus, *Stenzel* in view of *Kehtarnavaz* as applied by the Examiner would fail to teach or disclose at least three elements of independent claim 1, namely, first and second YCbCr averaging units and RGB gain controller, not to mention the claimed relationships between the elements. Independent claim 1 is hence clearly patentable over the applied art of record.

Claims 2-11 depend from claim 1, and are considered patentable at least for the reasons advanced with respect to claim 1.

New independent claim 12 includes limitations similar to those of claim 1, and should be considered patentable at least for the same reasons presented with respect to claim 1.

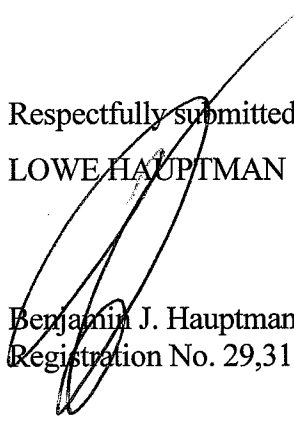
Claims 13-20 depend from claim 12, and are considered patentable at least for the reasons advanced with respect to claim 12.

Each of the Examiner’s rejections has been traversed. Accordingly, Applicants respectfully submit that all claims are now in condition for allowance. Early and favorable indication of allowance is courteously solicited.

The Examiner is invited to telephone the undersigned, Applicant’s attorney of record, to facilitate advancement of the present application.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,
LOWE HAUPTMAN & BERNER, LLP


Benjamin J. Hauptman
Registration No. 29,310

USPTO Customer No. 22429
1700 Diagonal Road, Suite 310
Alexandria, VA 22314
(703) 684-1111
(703) 518-5499 Facsimile
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BJH/KL/ayw